

COLE, RAYWID & BRAVERMAN, L.L.P.

ATTORNEYS AT LAW

1919 PENNSYLVANIA AVENUE, N.W., SUITE 200

WASHINGTON, D.C. 20006-3458

TELEPHONE (202) 659-9750

FAX (202) 452-0067

WWW.CRBLAW.COM

THERESA Z. CAVANAUGH

DIRECT DIAL

202-828-9857

TZCAVANAUGH@CRBLAW.COM

LOS ANGELES OFFICE

2381 ROSECRANS AVENUE, SUITE 110

EL SEGUNDO, CALIFORNIA 90245-4290

TELEPHONE (310) 643-7999

FAX (310) 643-7997

August 29, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

**Re: CC Docket No. 95-116
Request for Clarification of Section 52.31(a)(1) of the Rules**

Dear Ms. Dortch:

On behalf of Centennial Communications Corp. ("Centennial"), I am writing to request that the Commission confirm Centennial's understanding of when it is obligated to deploy local number portability ("LNP") when it receives a request for LNP deployment from a competing carrier, and the request was made between February 24 and November 24, 2003. Specifically, under Section 52.31(a)(1)(ii) of the FCC's rules, CMRS carriers in the top 100 MSAs were required to submit a "bona fide request" for LNP deployment to their competitors by February 24, 2003, in order to force the competitor to meet the November 24, 2003 LNP deployment deadline. In addition, Section 52.31(a)(1)(iv) of the rules sets out the time frames within which CMRS carriers must deploy LNP for bona fide requests received from competitors after November 24, 2003.

Section 52.31(a)(1) of the rules is silent as to the treatment of bona fide requests made between February 24 and November 24, 2003. It is Centennial's understanding that any bona fide request for LNP deployment made to a CMRS carrier who operates within the top 100 MSAs between February 24 and November 24 of this year should be treated as if it was received on or after November 24, 2003, and the deployment requirements/timeframes of Section 52.31(a)(1)(iv) would apply. However, it is Centennial's impression that there may be some confusion among certain CMRS carriers regarding bona fide requests made during this interim timeframe. Consequently, Centennial respectfully requests that the Commission clarify this

Marlene H. Dortch

August 29, 2003

Page 2

issue, perhaps when the Commission's Wireless Telecommunications Bureau issues its much anticipated additional guidance on wireless LNP implementation issues.

If you have any questions regarding this request, please contact Omar Martinez with Centennial at 787-717-0101, or the undersigned counsel for Centennial

Sincerely,

/s/ Theresa Z. Cavanaugh
Theresa Z. Cavanaugh